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VIA ECF

Hon. Jesse Furman  
United States District Court  
Southern District of New York  
40 Centre Street, Room 2202  
New York, NY 10007

Re: *City of Providence, et al. v. BATS Global Markets, Inc., et al.*, No. 14-cv-02811: Plaintiffs' Letter  
Motion for Leave to File Under Seal

Dear Judge Furman:

We write pursuant to Section 7(c) of Your Honor's Individual Rules of Practice to respectfully seek leave to file under seal and redact certain materials from Plaintiffs' forthcoming Reply Memorandum of Law in Further Support of Plaintiffs' Motion to Exclude the Report of James R. Burns.

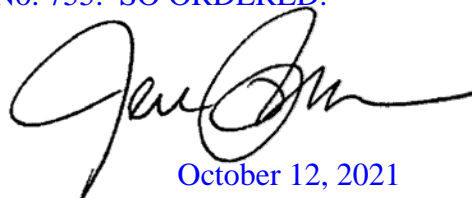
Plaintiffs' memorandum of law was filed in public redacted and sealed unredacted forms (*See* ECF Nos. 642, 647), which sealing the court temporarily approved in its order of July 27, 2021 (*See* ECF No. 666). Nasdaq similarly filed its memorandum of law in opposition in public redacted and sealed unredacted forms (*See* ECF Nos. 725, 735), which sealing the court temporarily approved of in its order of September 20, 2021 (*See* ECF No. 743).

The proposed redactions include references to documents designated Confidential or Highly Confidential by the Nasdaq and NYSE Defendants pursuant to the Stipulated Protective Order (ECF No. 402). Accordingly, consistent with prior sealing orders, Plaintiffs respectfully request that the Court temporarily grant leave to file the reply memorandum of law in public redacted and sealed unredacted forms.

Respectfully submitted,

By: /s/ Thomas G. Hoffman, Jr.  
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Once again, the motion is granted temporarily and the Court will assess whether to keep the materials sealed when deciding the underlying motion. The Clerk of Court is directed to terminate ECF No. 755. SO ORDERED.



October 12, 2021